

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

DOUGLAS S. CHABOT, *et al.*,

Plaintiffs,

v.

WALGREENS BOOTS ALLIANCE,
INC., STEFANO PESSINA, and
GEORGE R. FAIRWEATHER,

Defendants.

1:18-cv-2118-CCC-KM

Hon. Christopher C. Conner

ORAL ARGUMENT REQUESTED

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Defendants Walgreens Boots Alliance, Inc., Stefano Pessina, and George R. Fairweather (collectively, “Defendants”), by and through their undersigned counsel, hereby move this Court pursuant to Federal Rule of Civil Procedure 56 for an order granting summary judgment regarding the claims asserted in the Amended Complaint and entering judgment in their favor and against the Plaintiffs. Defendants set forth the grounds for the motion in their Brief, State of Undisputed Material Facts, the Declaration of Caroline Zalka, Esq. and the exhibits attached thereto. A proposed order is attached. Defendants respectfully request oral argument on this motion.

Dated: January 24, 2022

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CERTIFICATE OF NON-CONCURRENCE

Pursuant to Local Rule 7.1, I certify that Defendants' counsel sought concurrence in this motion from Plaintiffs and that Plaintiffs denied such concurrence.

Dated: January 24, 2022.

s/ Jonathan D. Polkes
Jonathan D. Polkes

CERTIFICATE OF SERVICE

Defendants' counsel hereby certifies that, on January 24, 2022, the foregoing was served on the parties in this action using the Court's CM/ECF filing system, which will automatically send e-mail notification of such filing to all counsel of record.

s/ Jonathan D. Polkes
Jonathan D. Polkes